

May 15, 1980

per/phone - FG

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Approval of Syntex Destruction Process - Verona, Missouri

Russ Wyer - Headquarters

Robert L. Morby, Region VII

As a member of the Region VII Dioxin Task Group, I have completed my review of the Syntex Process for the destruction of TCDD contained in 4,300 gallons of NEPACCO waste which is currently stored at the Syntex facility of Verona, Missouri. Additionally, I have reviewed other related documents including the Syntex Dioxin Detoxification Document, the Syntex Emergency Response Plan, EPA Region VII Monitor Plan and the Region's Contingency Plan.

It is recognized that the process will not destroy all TCDD and that residues containing low concentration of TCDD will need further treatment utilizing other destruction methods yet to be determined. Since the process for TCDD destruction is a low temperature and low pressure batch operation, it is my opinion that the possibility of a release during the destruction process is very small and adequate safeguards has been developed to handle such a contingency.

Based upon the review of the various documents and site inspections, I recommend that Syntex be given approval to proceed with the destruction of the TCDD with the following conditions:

1. Compliance with all provision of the TUSCA Section 6(d) approval notice.
2. All waste residue including process area rain water and contaminated drainage ditch water, must be contained on-site and not discharged until further approval is obtained for EPA.
3. Decontamination procedures for the existing storage tank (T-1) and process equipment be developed by Syntex and approved by EPA prior to commencing the decontamination phase.
4. The ultimate disposal methods for the residues including tank T-1 be reviewed and approved by EPA.

Recognizing that there are many additional steps to be taken beyond the initial destruction phase and that subsequent decisions are depended upon the performance of the process. I would appreciate receiving copies of all data obtained during the operation of process.



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CONCURRENCES

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